

EXHIBIT 11

NORTH CAROLINA
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

24 CVS _____

MARK KEITH ROBINSON,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	<u>COMPLAINT</u>
)	
CABLE NEWS NETWORK, INC.,)	<u>Demand for a Jury Trial</u>
)	
LOUIS LOVE MONEY,)	
)	
<i>Defendants.</i>)	
)	

1. CNN and Louis Love Money are responsible for a new low in digital lynching. In a malicious hit job so well timed as to be *uncanny*, they have published disgusting lies about Lieutenant Governor Mark Robinson in what appears to be a coordinated attack aimed at derailing his campaign for governor, and has already inflicted immeasurable harm to his family, his reputation, and his good name. This lawsuit, while utterly insufficient to right this wrong, shall serve as a small measure of accountability.

Parties

2. Lieutenant Governor Mark Keith Robinson (“Lt. Gov. Robinson”) is an individual who is a resident and citizen of North Carolina and maintains his office at the Hawkins-Hartness House at 310 North Blount Street, Raleigh for his work as the

Lieutenant Governor. He is the first black man to hold that title in North Carolina and is the Republican candidate for governor of North Carolina.

3. Defendant Cable News Network, Inc. (“CNN”) is a Delaware corporation, with its headquarters in Georgia. CNN purports itself to be “The Most Trusted Name in News” and is one of the world’s most well-recognized media companies. CNN’s broad network of television, website, social media accounts, and digital networks reaches millions of people in North Carolina. CNN has a bureau in Charlotte, North Carolina, is registered with the North Carolina Secretary of State as a foreign corporation authorized to do business in North Carolina, and maintains a registered agent in Raleigh, North Carolina.

4. Defendant Louis Love Money (“Money”) is an individual who is a resident and citizen of North Carolina and resides in Guilford County. He is 52 years old, sings in a local punk rock band called Trailer Park Orchestra, and appears to have changed his name from Louis Alen Wooten.

Jurisdiction & Venue

5. This Court has subject matter jurisdiction over this cause of action pursuant to North Carolina General Statutes § 1-75.4.

6. This Court has personal jurisdiction because Defendants transmitted their statements into North Carolina, relied on North Carolina sources, the statements, evidenced by their focus on the current Lieutenant Governor of North Carolina and candidate for Governor of North Carolina, focused on North Carolina with the intent that the statements’ impact would be felt in North Carolina, Lt. Gov.

Robinson felt the harm of Defendants' statements in North Carolina, and personal jurisdiction is consistent with the North Carolina Long Arm Statute, N.C. Gen. Stat. § 1-75.4. Further, Defendant Money lives in North Carolina.

7. Venue for this action is properly in Wake County, North Carolina, pursuant to North Carolina General Statutes § 1-82.

The Defamatory Statements

8. On August 11, 2024, Defendant Money released a music video on YouTube—his band's first in three years—titled “The Lt. Governor Owes Me Money” (the “Music Video”). In the Music Video, a man in a suit, wearing a generic rubber mask of a black man, intended to depict Lt. Gov. Robinson, enters a pornography video store to view and purchase pornographic videos. In the Music Video, Defendant Money repeatedly addresses the song to “Mark” and to “Mr. Robinson,” further identifying the subject as the “first black man” to hold the title of lieutenant governor. The lyrics of the song falsely accuse Lt. Gov. Robinson of owing money for a “bootleg” porn video that Defendant Money supposedly produced for him, which is the basis for the song’s title.

9. *Within weeks* of this then-obscure, barely-viewed Music Video being published, Defendant Money was interviewed by a major online publication with links to George Soros, The Assembly. This resulted in an article published on September 3, 2024, titled “Ex-Porn Shop Employees Say Mark Robinson Was A Regular. He Denies It.” (the “Assembly Article”). In the Assembly Article, Defendant Money falsely alleges that in the 1990s and early 2000s—when Lt. Gov. Robinson

was already a married father of two children—Robinson was a “frequent customer” at a pornographic video store where Money worked. According to Defendant Money’s outrageously false allegations, Lt. Gov. Robinson, for “several years,” hung out at the X-rated video store “five nights a week”—sometimes until 4:00 a.m.—“spending a good amount of money,” paying \$8 per video to preview “two or more” porn videos a night in a private booth, and purchasing “hundreds” of “bootleg” porn videos for \$20–\$25 a piece. According to Defendant Money, these bootleg videos were “super hardcore” and compiled from videos too risqué or extreme to sell in North Carolina. Echoing his false allegations from the Music Video, Defendant Money once again claims that Lt. Gov. Robinson owes him money for one of these bootleg porn videos.

10. These false allegations from the Music Video and the Assembly Article are hereinafter referred to collectively as the “Defendant Money Defamatory Statements.”

11. *Sixteen days after the Assembly Article*, CNN published an article, salaciously titled “I’m a black NAZI!: NC GOP nominee for governor made dozens of disturbing comments on porn forum” (the “CNN Article”). In the CNN Article, CNN falsely attributes statements allegedly made on a pornographic website, NudeAfrica.com, under the username “minisoldr” as being authored by Lt. Gov. Robinson. These falsely attributed statements include several lewd, sex-obsessed, racist, and outrageous statements, including the comment from the title of the article, “I’m a black NAZI!” CNN claims that these statements are only a “selection” and a “small portion” of graphic statements it attributes to Lt. Gov. Robinson from the

NudeAfrica website, suggesting that the withheld statements are even more obscene than those included in the CNN Article. The CNN Article also falsely claims that Lt. Gov. Robinson, as a married man, created an account on AdultFriendFinder.com, which is a website used to find sexual partners.

These false statements from the CNN Article are hereinafter referred to as the CNN Defamatory Statements.

Factual Background

Background of Lieutenant Governor Robinson

12. Mark Robinson is the father of two grown children, and husband of 34 years to his wife Yolanda. He is the lieutenant governor of North Carolina—the first black man to hold this position. He is the Republican candidate for governor. He is a community leader and passionate advocate for education and Constitutional rights. He is a role model. But this was all hard-fought. He had to lift himself out of poverty and out of bankruptcy. He overcame growing up with an abusive, alcoholic father, and stints in foster care. He was the first in his family to graduate from college.

13. CNN and Louis Love Money, in their cynical and malicious smears, are trying to tear him down and take away all that he has achieved by portraying him as something he is not.

14. After graduating high school, Mark Robinson joined the Army Reserve and served until 1993, when he was honorably discharged.

15. In the 1990s, Mark Robinson was a young father, struggling to provide for his family. During this period, he worked at Papa John's pizza, eventually being

promoted to manager, where he sometimes managed the closing shift. Nearby was an adult video store where Defendant Money worked. Lt. Gov. Robinson, who has always been a gregarious, outgoing person, made friends with Defendant Money, who also worked the night shift. He would occasionally bring over free pizza and socialize. More often, however, Defendant Money would come over to the Papa John's, looking for free or discounted pizza.

16. Contrary to the portrayal by Defendant Money, Lt. Gov. Robinson was not spending hours at the video store, five nights a week. He was not renting or previewing videos, and he did not purchase "bootleg" or other videos from Defendant Money. When Robinson managed the closing shift, usually closing at around midnight, he went home after work so that he could wake up at a reasonable hour and spend time with his wife and two young children. Robinson stopped working at Papa John's in or about early 2001, and from then until 2022 he never saw Defendant Money again.

17. After Papa John's, Robinson worked for various manufacturing companies, including Hayco, an aircraft manufacturer.

18. Lt. Gov. Robinson was an early adopter of Facebook. He joined in 2007, and he has maintained an unlocked, public account since then. He was also an active user, getting into heated political and social debates, with other Facebook users from those early days. Against the advice of many, he never deleted his history or made the account private. He believes in transparency. Even though his views have changed over the course of 17 years, as a public servant, Lt. Gov. Robinson believes

that North Carolina voters have the right to know what he has said in the past, and—critically to this lawsuit—what he has *not*.

19. In 2018, Lt. Gov. Robinson started a new chapter in his life, bursting onto the political scene as a complete outsider. He showed up to a city council meeting as a concerned citizen, because they were debating whether to cancel a gun show in the wake of a horrific school shooting in Parkland, Florida. He stood in line to speak his mind in defense of the Second Amendment and did so in a passionate speech that went viral on the internet.

20. From there, Lt. Gov. Robinson became far more interested and involved in politics. He became active in the Guilford County GOP, started giving speeches to organizations like the National Rifle Association, and in 2020 he threw his hat in the ring for lieutenant governor of North Carolina. To the surprise of many, including himself, he won.

21. As lieutenant governor, Robinson has been a tireless leader, helping to improve quality and access to education in North Carolina. He has been a fierce advocate for supporting North Carolina families, and pro-life initiatives. Currently, he is leading the effort to provide disaster relief to North Carolinians whose homes and livelihoods have been destroyed by Hurricane Helene.

Defendant Money spins a defamatory fantasy

22. In 2022, Lt. Gov. Robinson was at Planet Fitness for his routine workout when he heard a friendly greeting. It was Defendant Money. Lt. Gov. Robinson recognized him but couldn't place him at the time. They had a pleasant conversation

that consisted mostly of Defendant Money saying how proud he was of Mark, and that it was great to see a regular, working-class guy succeed in politics. There was no talk about bootleg videos or Lt. Gov. Robinson owing him any money. Defendant Money asked for a photo with the lieutenant governor, and that was the end of the encounter.

23. Lt. Gov. Robinson didn't give this a second thought. He was regularly recognized for his public role, and he was always happy to speak with and take photos with constituents and acquaintances. Unknown to the lieutenant governor, however, Defendant Money would later use this encounter and their prior, passing acquaintance against him in a fantasy, concocted by Money to embarrass and tear him down, and to seek his own fifteen minutes of fame.

24. In August 2024, Defendant Money released the Music Video, as described above. Initially, it was seen by very few people. Within weeks, however, Defendant Money sat for an interview with The Assembly, a publication with ties to George Soros. The Assembly Article was viewed by tens of thousands of people, which also raised the profile of the Music Video, causing thousands of people to view and share it online.

25. While Defendant Money describes the song in the Assembly interview as a harmless "inside joke," the entire premise of the Music Video is not a joke, but a deliberate lie. Moreover, the Music Video was intended to be understood as fact, not as hyperbole or exaggeration. Defendant Money admits this in the Assembly Article.

26. Defendant Money spins his fantasy to even greater heights of falsity and depravity in the Assembly interview by claiming that Lt. Gov. Robinson—then a financially struggling, married father of two young children—was spending *every night* after work, for *hours* at a time—even until 4:00 a.m.—hanging out at an adult video store, and spending *thousands of dollars* on “hardcore,” bootleg porn videos—some too risqué or explicit to sell in the state of North Carolina—and on private booth previews. Every bit of this is knowingly false, but Defendant Money uses his selfie with Lt. Gov. Robinson in 2022, and his fellow porn store friends as supposed corroboration.

27. Defendant Money appears to take great pleasure from the publicity he is receiving from these lies. In a subsequent YouTube video, Defendant Money gloats over the publicity he has gotten and *thanks* Lt. Gov. Robinson for denying the story. In his X bio, he now describes himself as “the most famous former porn clerk in the world!”

28. Defendant Money tacitly admits that his story was timed to coincide with the election and cause Lt. Gov. Robinson maximum damage, saying “I’m glad I waited” to make the Music Video. He even posts memes on X suggesting that his Music Video “saved” young women by derailing the candidacy of a Republican, pro-life governor.

CNN piles on with its own impeccably timed and recklessly false hit piece

29. Prior to publication of the CNN Article, CNN reached out to Lt. Gov. Robinson. He specifically and unequivocally denied CNN’s allegations that he used

or created the “minisoldr” NudeAfrica profile or made any of those statements. He told CNN that it was entirely manufactured. CNN did not give Lt. Gov. Robinson any opportunity to inspect or investigate any of the source material for these alleged statements.

30. CNN, despite Lt. Gov. Robinson’s explicit denials, chose to publish the CNN Article based on data from a dubious website, supposed corroboration from unverified—indeed, *unverifiable*—data, apparently sourced from hacked, data breach files, obtained from the dark web. It chose to publish despite knowing or recklessly disregarding that Lt. Gov. Robinson’s data—including his name, date of birth, passwords, and the email address supposedly associated with the NudeAfrica account—were previously compromised by multiple data breaches. Any person could have purchased and/or used Lt. Gov. Robinson’s data to create accounts all over the internet. As CNN is aware, people who create accounts on websites like NudeAfrica, and AdultFriendFinder prefer *not* to use their own names and identities for obvious reasons.

31. The CNN Article includes reference to Defendant Money’s allegations as reported in the Assembly Article, provides a link to the Assembly Article, and notes Lt. Gov. Robinson’s denial. This re-reporting by CNN expanded the reach of Defendant Money’s Defamatory Statements even further.

32. On October 1, 2024, Lt. Gov. Robinson, by counsel, sent a retraction demand to CNN. Two days later, on October 3, 2024, Lt. Gov. Robinson further demanded that CNN produce the source material for its bogus allegations so that it

could be subjected to forensic scrutiny and verification. CNN responded the next day, refusing to retract the article and has still declined to produce any of its source material for inspection.

33. Almost immediately after the CNN Article broke, the management of NudeAfrica *shut down* the forum section of its website, where these alleged posts were supposedly archived. It then apparently *deleted* all messages from minisoldr, thereby removing any evidence that could be investigated. As of this filing, the owner of NudeAfrica has ignored all attempts to contact him.

34. CNN had every reason to doubt the veracity of the data upon which it relied. CNN knew that supposed archives from a suspicious website like NudeAfrica were unreliable and failed to meaningfully investigate or digitally scrutinize them. CNN knew that supposedly corroborating information it used was from unverifiable, dark web-sourced data breach files. CNN knew or recklessly disregarded the fact that Lt. Gov. Robinson's email, passwords, and personal data had been stolen. CNN knew that Lt. Gov. Robinson's facebook history, which is unlocked and transparent to all, goes back to 2007. CNN knew that just weeks prior to its article, Lt. Gov. Robinson had been targeted by another ludicrous and dubiously sourced hit piece by The Assembly. CNN knew that the election was less than two months away.

35. With all that knowledge, rather than conduct any kind of serious investigation or digital forensics on these supposedly decade-old posts, or even question the timing for their surfacing all-of-a-sudden, CNN recklessly proceeded to attribute them to Lt. Gov. Robinson. It disregarded or deliberately avoided the truth,

fully intending to derail Lt. Gov. Robinson's political career. CNN's continued failure to produce any source material and NudeAfrica's cleansing of its website are telling on this point.

36. CNN—a politically left-wing media outlet, whose reporting is often indistinguishable from Democrat party talking points and opposes politically conservative candidates for office, including Lt. Gov. Robinson—intended to damage Lt. Gov. Robinson's gubernatorial run. CNN published the CNN Article and attributed the “minisoldr” posts to Lt. Gov. Robinson despite harboring doubt over the veracity and verifiability of the supposedly supporting information and deliberately avoided the truth.

37. Lt. Gov. Robinson can never be fully compensated for the damage done by Defendants' lies. His private and public lives have been devastated. Friends and family have turned their backs on him. He has been humiliated. It is therefore imperative that CNN, Money, and anyone else involved, be held fully accountable, not just to mitigate the harm they have done, but to vindicate Lt. Gov. Robinson and allow him to begin the healing process.

COUNT I
Defamation and Defamation *per se* against Defendant Money

38. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 37 above.

39. Defendant Money's Defamatory Statements are knowingly false.

40. Defendant Money published his Defamatory Statements to thousands of people on the internet, via YouTube, X, and by giving an interview to The Assembly.

Defendant Money's lies, as intended by Defendant, have been reposted and reshared online to thousands more.

41. Defendant Money's Defamatory Statements are reasonably understood to be statements of fact, rather than hyperbole or opinion, as demonstrated not only by the language used by Defendant, but by the reactions and comments of hundreds of individuals who responded to and reposted Defendant's statements.

42. Defendant Money's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant Money.

43. Defendant Money, therefore, is liable for compensatory damages.

44. Defendant Money is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant Money's actual malice.

45. Defendant Money's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

46. Defendant Money acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's extreme antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, his blatant fabrications, and his actual knowledge of the falsity of his statements.

COUNT II
Defamation and Defamation *per se* against Defendant CNN

47. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 37 above.

48. CNN's Defamatory Statements are recklessly false.

49. Defendant CNN published its Defamatory Statements to hundreds of thousands of people on the internet, via its website and social media networks. Defendant CNN's Defamatory Statements, as intended by CNN, have been reposted and reshared online to thousands more.

50. Defendant CNN's Defamatory Statements are reasonably understood to be statements of fact because they are reported in a news article which purports to report facts.

51. Defendant CNN's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant CNN.

52. Defendant CNN, therefore, is liable for compensatory damages.

53. Defendant CNN is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant CNN's actual malice.

54. Defendant CNN's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

55. Defendant CNN acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, CNN's actual knowledge of the dubious nature and timing of the allegations, its use of unverifiable data to corroborate its reporting, its reckless failure to investigate, and its knowledge of exculpatory information and alternative explanations that it deliberately omitted from the CNN Article.

Prayer for Relief

WHEREFORE, Plaintiff Mark Robinson demands judgment against Defendants as follows:

- a. An award of compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendants have made off of their lies about Mark Robinson, in an amount to be proven at trial, but no less than fifty million dollars (\$50,000,000.00);
- b. An award of Plaintiff's costs associated with this action; and
- c. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

Demand for Jury Trial

Plaintiff demands a trial by jury on all issues so triable.

Dated: October 15, 2024

MARK ROBINSON

By Counsel

Respectfully submitted,

/s/ Anthony J. Biller

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